

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

IN RE:)	Chapter 13
)	
Brianna Brown,)	Case No. 21-80450
)	
Debtor(s).)	Judge Lynch
_____)	
)	
Brianna Brown,)	
)	
Plaintiff(s),)	
)	
v.)	Adv. No. 21-96009
)	
Nissan Motor Acceptance Corporation,)	
)	
Defendant.)	

NOTICE OF MOTION

TO: Office of Lydia Meyer, Chapter 13 Trustee (via electronic Court notice)
Nissan Motor Acceptance Corporation, PO Box 660366, Dallas, TX 75266-0366
Nissan Motor Acceptance Corporation, 990 W 190th St., Torrance, CA 90502
Nissan Motor Acceptance Corporation, Attn: Kevin Cullum, President, One Nissan Way
Franklin, TN 37067

YOU ARE HEREBY NOTIFIED that on April 29, 2021 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Judge Lynch, or any Judge sitting in his stead and present the Expedite Hearing and for Turnover of 2016 Nissan Murano, a copy of which is hereby attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 291 5226 and the password is 852255. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of

Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ David H. Cutler

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the above and foregoing Notice and attached Motion to be served on the Trustee via Electronic Court Notice and on the remaining person(s) and/or firm(s) on referenced above via first class US Mail, proper postage prepaid on the April 15, 2021.

/s/ David H. Cutler

Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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Nissan Motor Acceptance Corporation,)	
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Defendant.)	

**MOTION TO EXPEDITE HEARING AND
FOR TURNOVER OF 2016 NISSAN MURANO**

NOW COMES the Plaintiff, Brianna Brown, by and through her attorneys, Cutler & Associates, Ltd, and in support of her Motion to Expedite Hearing and for Turnover of 2016 Nissan Murano, states as follows:

1. The instant Adversary Complaint for Turnover of Motor Vehicle (2016 Nissan Murano, VIN # 1N4AA6AP2GC400494) pursuant to 11 U.S.C. § 542 was filed on April 7, 2021.
2. The Plaintiff is without adequate transportation because the Defendant is in possession of the subject vehicle.
3. The Plaintiff is continually harmed by each day that she is without his vehicle.
4. The Plaintiff requests that this Court enter an order requiring the immediate return of the vehicle or hold the final hearing/trial of this case as soon as possible.

WHEREFORE, the Plaintiff, Brianna Brown, prays for the following relief:

- B. For such other and further relief as this Court deems equitable and just.

Dated: April 15, 2021

One of the attorneys for the Debtor

Cutler & Associates, Ltd.
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Skokie, IL 60076
Phone: (847) 673-8600